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12 Attorneys for United States of America

13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA

15 OAKLAND DIVISION

16 UNITED STATES OF AMERICA,) NO. 21-CR-429 YGR
17 Plaintiff,)
18 v.) STIPULATION AND ORDER CONTINUING
19 RAY GARCIA,) STATUS CONFERENCE AND EXCLUDING
20 Defendant.) TIME UNDER THE SPEEDY TRIAL ACT
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23 A status conference in the above-captioned case is scheduled for May 11, 2022. The Court has
24 notified the parties that the Court is unavailable on that day. Counsel for the United States and counsel
25 for the defendant jointly stipulate and request that that status conference be continued to June 1, 2022,
26 and that time be excluded under the Speedy Trial Act from May 11, 2022 to June 1, 2022.

27 The government and counsel for the defendant have agreed that time be excluded under and the
28 Speedy Trial Act so that defense counsel can continue to prepare. The government has produced
voluminous discovery to defense counsel. For these reasons, the parties stipulate and agree that
excluding time until June 1, 2022, will allow for the effective preparation of counsel. *See* 18 U.S.C. §
3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding

STIPULATION TO EXCLUDE TIME
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1 time from May 11, 2022 to June 1, 2022, from computation under the Speedy Trial Act outweighs the
2 best interests of the public and the defendant in a speedy trial. 18 U.S.C. §§ 3161(h)(7)(A), (B)(iv).

3 The undersigned Assistant United States Attorney certifies that she has obtained approval from
4 counsel for the defendant to file this stipulation, request, and proposed order.

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6 IT IS SO STIPULATED.

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8 DATED: May 5, 2022

/s/ Molly K. Priedeman
MOLLY K. PRIEDEMAN
Assistant United States Attorney

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10 DATED: May 5, 2022

/s/ James Reilly
JAMES REILLY
Attorney for the Defendant

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AND ORDER

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ORDER

2 Based upon the representations of counsel and for good cause shown, the Court finds that failing
3 to exclude the time from May 11, 2022 to June 1, 2022, would unreasonably deny defense counsel and
4 the defendant the reasonable time necessary for effective preparation and continuity of counsel, taking
5 into account the exercise of due diligence. 18 U.S.C. §3161(h)(7)(B)(iv). The Court further finds that
6 the ends of justice served by excluding the time from May 11, 2022 to June 1, 2022, from computation
7 under the Speedy Trial Act outweighs the best interests of the public and the defendant in a speedy trial.
8 Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from May 11,
9 2022 to June 1, 2022, shall be excluded from computation under the Speedy Trial Act and the status
10 conference is continued to June 1, 2022

IT IS SO ORDERED.

DATED: May 9, 2022

Yvonne Gonzalez Rogers
THE HONORABLE YVONNE GONZALEZ ROGERS
United States District Judge